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Attorneys for Legalist, Inc.

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	) Case No. 23-32924
50 CROSBY PINES, LTD., et al,1	) Chapter 11
Debtors.	) Jointly Administered

## NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned hereby enters their appearance pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b) in the above-captioned case as counsel to **Legalist**, **Inc.**, a party-in-interest in the above-captioned case, and requests that, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, all notices given or required to be given in this case be given and served upon:

Jeff P. Prostok State Bar No. 16352500 Lynda L. Lankford State Bar No. 11935020 FORSHEY & PROSTOK LLP 777 Main St., Suite 1550 Fort Worth, TX 76102 Telephone: 817-877-8855

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last 4 digits of their respective Employer Identification Numbers, are: (a) 50 Crosby Pines, Ltd. (No. 23-32924, EIN x2512); (b) 48 Highland Shores, Ltd. (No. 23-33843, EIN x4869); (c) 53 Eagles Cove, Ltd. (No. 23-33844, EIN x8026); and (d) 171 Lone Stag, Ltd. (No. 23-33845, EIN x2240).

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the

Bankruptcy Code, the foregoing request includes the notices and papers referred to in the Rules and sections cited above, and also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, facsimile, electronically or otherwise filed or served with regard to the referenced case and proceedings therein.

This Notice of Appearance shall not be deemed or construed to be a waiver of any rights, including, without limitation, the right (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) any consent to the exercise of the Court's jurisdiction, or (4) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or any other rights, claims, actions, defenses, setoffs, or recoupment in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupment are hereby expressly reserved.

Dated: January 15, 2024. Respectfully submitted,

FORSHEY & PROSTOK, LLP

/s/ Jeff P. Prostok
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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via ECF electronic Notice on January 15, 2024.

/s/ Jeff P. Prostok
Jeff P. Prostok

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